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*Attorneys for Artemis Langford*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

JAYLYN WESTENBROEK, HANNAH, )  
HOLTMEIER, ALLISON COGHAN, GRACE )  
CHOATE, MADELINE RAMAR, and MEGAN )  
KOSAR, on behalf of themselves and )  
derivatively on behalf of KAPPA KAPPA )  
GAMMA FRATERNITY, )

Plaintiffs, )

v. )

Civil Action No.: 23-CV-00051-ABJ

KAPPA KAPPA GAMMA FRATERNITY, an )  
Ohio non-profit corporation, as a Nominal )  
Defendant and as a Direct Defendant; )  
MARY PAT ROONEY, President of the )  
Fraternity Council of KAPPA KAPPA GAMMA )  
FRATERNITY, in her official capacity, KAPPA )  
KAPPA GAMMA BUILDING CO., a Wyoming )  
non-profit corporation, and ARTEMIS )  
LANGFORD, )

Defendants. )

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**BERKNESS DECLARATION IN SUPPORT OF MOTINO TO DISMISS  
ALLEGATIONS AGAINST ARTEMIS LANGFORD WITH PREJUDICE**

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I, Rachel Berkness, hereby declare as follows:

1. At all relevant times, I served as counsel to Artemis Langford in this action.

2. I am in possession of a video “Rocky Mountain Women’s Network” took at the University of Wyoming campus after claiming the suit was “thrown out by Judge Alan Johnson because he said he could not define the word ‘woman.’” They arrived with rocks they had painted with messages such as “Artemis Langford is a man.” In a video which the group describes as “the record of our dissent,” the group can be seen placing flyers around campus that contain a photo of Ms. Langford’s face along with statistics indicating that she is predisposed to commit sex crimes. The group left humiliating chalk messages with Ms. Langford’s name on the sidewalks and hung a banner on an overpass that read “#everybodyknows ‘Artemis’ Langford is a man.”
3. I am in possession of video of Ms. Gaines’ speech at the University of Wyoming in which she says: “The judge, was appointed by Ronald Reagan, 87-years-old, how is he still breathing? He told these girls in regards to this incident right here, their sorority and allowing a male into this space with these girls who have been promised sisterhood . . . this judge, again who is on his last breath, said, ‘Who am I to define what a woman is? . . . They can interpret it however they want.’”

Dated 02/28/2025 .

/s/ Rachel Berkness  
Rachel M. Berkness, Bar No. 7-5966  
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**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission this 28th day of February 2025.

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/s/ Rachel Berkness

Rachel Berkness